



2010

## FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL AGRICULTURE MONITORING REPORT

**COMPANY:** Syngenta AG  
**COUNTRY:** India  
**PROVINCE:** Maharashtra  
**MONITOR:** Glocal Research & Consultancy Services  
**AUDIT DATE:** January 28 – 31, 2011  
**PRODUCTS:** Eggplant Seeds  
**NUMBER OF WORKERS:** 84  
**NUMBER OF WORKERS INTERVIEWED:** 32  
**NUMBER OF FARMS VISITED:** 26  
**TOTAL AREA COVERED UNDER AUDIT:** 13 Acres  
**PROCESSES:** Hybridization, Fertilizer Application, Staking & Pruning Plants



## CONTENTS:

Wages, Benefits and Overtime Compensation: General Compliance Wages, Benefits and Overtime Compensation _____	3
Wages, Benefits and Overtime Compensation: Minimum Wage _____	4
Wages, Benefits and Overtime Compensation: Worker Wage Awareness _____	5
Wages, Benefits and Overtime Compensation: Record Maintenance _____	6
Wages, Benefits and Overtime Compensation: Payment for Overtime _____	7
Forced Labor: Employment Terms/Voluntary Agreement _____	8
Freedom of Association: Other _____	9
Harassment or Abuse: Discipline/Fair and Non-Discriminatory Application _____	10
Harassment or Abuse: Grievance Procedure _____	11
Child Labor: Proof of Age Documentation _____	12
Child Labor: Other Means of Age Verification _____	13
Child Labor: Education of Young Workers _____	14
Child Labor: Removal and Rehabilitation of Child Laborers _____	15
Non-Discrimination: General Compliance Non-Discrimination _____	16
Non-Discrimination: Employment Decisions _____	17
Non-Discrimination: Sex-Based Wage Discrimination _____	18
Code Awareness: _____	19
Code Awareness: Other (Company Internal Grievance Policy and Procedures) _____	20
Health and Safety: General Compliance Health and Safety _____	21
Health and Safety: Document Maintenance/Worker Accessibility and Awareness _____	22
Health and Safety: Health and Safety Management System _____	23
Health and Safety: Communication to Workers _____	24
Health and Safety: Access to Safety Equipment and First Aid _____	25
Health and Safety: Personal Protective Equipment _____	26
Health and Safety: Chemical Management and Training _____	27
Health and Safety: Machinery Maintenance and Worker Training _____	28
Hours of Work: General Compliance Hours of Work _____	29
Hours of Work: Rest Day _____	30
Hours of Work: Overtime _____	31
Hours of Work: Public Holidays _____	32

## **Wages, Benefits and Overtime Compensation: General Compliance Wages, Benefits and Overtime Compensation**

WBOT.1 Growers shall comply with all local laws, regulations and procedures concerning the payment of wages and benefits, including overtime compensation. In any case where laws and the FLA Workplace Code of Conduct are contradictory, the standard providing the greatest protection for workers shall apply. Where provisions are lacking, growers shall take measures to reasonably accommodate matters concerning payments of wages and benefits, including overtime compensation.

### **Noncompliance**

**Explanation:** Wages paid for certain operations are below legal minimum wages. Minimum daily wage prescribed for agricultural labor as per the local law varies between Rs 100- 120. E.g., operations like transplantation, weeding, cross pollination and harvesting, which are carried out mostly by women, earn workers Rs 60-100, which is less than legal minimum wage.

Sources: worker and grower interviews

Legal Reference: The Minimum Wages Act 1948

**Plan Of Action:** Syngenta is consistently trying to convince growers to pay as per local law. In internal monitoring, we have noticed there is a greater degree of improvement in daily wage rates. Wages are certainly improved over past years. In some villages, wage rates are crossed, as are the minimum wage limits.

#### Actions:

1. Bringing more awareness in this area.
2. Close monitoring of wages.
3. Involving local government and stakeholders in addressing this issue.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**

## **Wages, Benefits and Overtime Compensation: Minimum Wage**

WBOT.2 Growers shall pay workers the legal minimum wage or the prevailing regional wage, whichever is higher.

### **Noncompliance**

**Explanation:** Wages paid for certain operations are below legal minimum wages. Minimum daily wage prescribed for agricultural labor as per the local law varies between Rs 100- 120. E.g., operations like transplantation, weeding, cross pollination and harvesting, which are carried out mostly by women, earn workers Rs 60-100, which is less than legal minimum wage.

Sources: farm visits; record review; worker and grower interviews

Legal Reference: The Minimum Wages Act 1948

**Plan Of Action:** Syngenta is consistently trying to convince growers to pay as per local law. In internal monitoring, we have noticed there is a greater degree of improvement in daily wage rates. Wages are certainly improved over past years. In some villages, wage rates are crossed, as are the minimum wage limits.

#### Actions:

1. Bringing more awareness in this area.
2. Close monitoring of wages.
3. Involving local government and stakeholders in addressing this issue.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**

**Wages, Benefits and Overtime Compensation: Worker Wage Awareness**

WBOT.6 Growers/Organizers/Company shall make an effort to educate workers so that terms of employment, wages, benefits and deductions shall be clearly understood and acceptable by workers.

**Noncompliance**

**Explanation:** Workers are not aware of their legally entitled wages and benefits. Grower or company has not made attempts.

Sources: worker and grower interviews

**Plan Of Action:** Syngenta is consistently trying to convince growers to pay as per local law. In internal monitoring, we have noticed there is a greater degree of improvement in daily wage rates. Wages are certainly improved over past years. In some villages, wage rates are crossed, as are the minimum wage limits.

Actions:

1. Bringing more awareness in this area.
2. Close monitoring of wages.
3. Involving local government and stakeholders in addressing this issue.

**Deadline  
Date:**

**Action  
Taken:**

**Plan  
Complete:**

**Plan  
Complete  
Date:**

### **Wages, Benefits and Overtime Compensation: Record Maintenance**

WBOT.7 Company shall make efforts to educate and assist growers in maintaining records of wages provided to the worker in cash or in-kind or both; these records shall be acknowledged by the worker.

#### **Noncompliance**

**Explanation:** Most growers are not maintaining any wage records.

Sources: worker and grower interviews

**Plan Of Action:** Though maintaining documents at farms is difficult, it is important. Company has designed and provided a simple, uniform documentation system (attendance register) for growers, which can help them maintain records of employment; wages and advances; hours of work, etc. Incentives can be a way to promote record maintenance. Awareness building needs to happen around record maintenance, as this can lead to growers' and workers' own good. We believe that documentation over the last few years has been improved.

Actions:

More awareness will be generated among growers to maintain documents like attendance registers; age verification documents of all the workers; contracts between the growers and annual workers, etc.

**Deadline  
Date:**

**Action  
Taken:**

**Plan  
Complete:**

**Plan  
Complete  
Date:**

## Wages, Benefits and Overtime Compensation: Payment for Overtime

WBOT.10 The additional payment for overtime (OT) hours will be prescribed by local law. In cases of countries where there is no law regarding OT, workers shall be paid a premium rate for these hours.

### Noncompliance

**Explanation:** Most workers reported they are not paid any additional money for overtime work. Workers are not aware of their legal entitlements.

Sources: worker and grower interviews

**Plan Of Action:** Actions: Awareness about hours of work to be created among workers and growers. It is a fact that currently, without being paid an additional amount for additional work, there are no workers who will work on the farm. However, some mechanism to record hours of work will be created.

**Deadline Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**



## **Forced Labor: Employment Terms/Voluntary Agreement**

F.3 Employment terms shall be those to which the worker has voluntarily agreed, in as far as those terms do not fall below provisions of local laws, freely negotiated and valid collective bargaining agreements, or the FLA Workplace Code of Conduct.

### **Noncompliance**

**Explanation:** Prevailing market wage rates constitute the basis for the verbal agreement terms between the grower and seasonal workers who take advances against their wage payments. Though workers voluntarily enter these agreements, the prevailing wage rates for most agricultural operations in this region are below legal minimum wages.

Sources: record review; worker and grower interviews

Legal Reference: The Minimum Wages Act 1948

**Plan Of Action:** In some cases, growers engage annual and seasonal workers to conduct farm operations smoothly. This type of engagement is always verbal and a verbal contract is made between growers and laborers. This requires attention, as we have planned a remediation plan.

#### Actions:

1. We will educate growers on various aspects of law related with annual and seasonal labor contracts.
2. Syngenta would encourage growers to have written contract between growers and laborers, with clearly specified employment terms and conditions. Document should be maintained.

**Deadline  
Date:**

**Action  
Taken:**

**Plan  
Complete:**

**Plan  
Complete  
Date:**



**Freedom of Association: Other**

Other

**Noncompliance**

**Explanation:** There is no formal grievance system in place for workers to raise their concerns.

Sources: worker and grower interviews

Legal Reference: The Minimum Wages Act 1948

**Plan Of Action:** Syngenta to create awareness through training programs for all concerned stakeholders on noncompliance, develop a culture of transparent work environment and establish strong communication among the team.

Actions:

1. Syngenta has started engaging opinion leaders, teachers and women at the village level to form a committee to serve as a channel for information dissemination and worker grievances. At least 50% of these Grievance Committee members will be women. Company will take appropriate steps to publicize this grievance channel among growers and workers. Contact information of village committee members, organizers and company supervisors will be made available to growers and workers. Village committee will contact company in case of grievances.
2. One day per month will be assigned to the company representative to deal with worker grievances at the field level. All grievances from the workers will be documented for analysis.
3. In the long term, an internal system within the monitoring program will be developed to award growers with zero grievances.
4. Supervisors will be equipped with visiting cards on which contact numbers of respective regional project manager (RPM) and project coordinator will be mentioned; workers will be educated to contact these numbers on noncompliances they observe.
5. Leaflets with information on emergency numbers will be distributed among workers.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan  
Complete  
Date:**

**Harassment or Abuse: Discipline/Fair and Non-Discriminatory Application**

H&A.2 Growers will follow disciplinary practices that are fair and clearly understood by workers. Growers will take necessary steps to ensure that the farm's disciplinary procedure is clearly understood by the workers.

**Noncompliance**

**Explanation:** [Company has not communicated any written disciplinary policy and procedures to growers.](#)

[Sources: worker and grower interviews](#)

**Plan Of  
Action:** [Actions:  
Syngenta would conduct awareness programs/campaigns to communicate policy and procedures.](#)

**Deadline  
Date:**

**Action  
Taken:**

**Plan  
Complete:**

**Plan  
Complete  
Date:**

## Harassment or Abuse: Grievance Procedure

H&A.12 Company shall have in place grievance procedures that first allow an attempt to settle grievances directly between the worker and the grower; however, where this is inappropriate or has failed, it should be possible for the worker to have the grievance considered at one or more steps, depending on the grievance's nature and the enterprise's structure and size. Company shall ensure that workers know the grievance procedures and applicable rules.

### Noncompliance

**Explanation:** No proper grievance policy and procedures are in place.

Sources: worker and grower interviews

**Plan Of Action:** Syngenta to create awareness through training programs for all concerned stakeholders on noncompliance, develop a culture of transparent work environment and establish strong communication among the team.

#### Actions:

1. Syngenta has started engaging opinion leaders, teachers and women at the village level to form a committee to serve as a channel for information dissemination and worker grievances. At least 50% of these Grievance Committee members will be women. Company will take appropriate steps to publicize this grievance channel among growers and workers. Contact information of village committee members, organizers and company supervisors will be made available to growers and workers. Village committee will contact company in case of grievances.
2. One day per month will be assigned to the company representative to deal with worker grievances at the field level. All grievances from the workers will be documented for analysis.
3. In the long term, an internal system within the monitoring program will be developed to award growers with zero grievances.
4. Supervisors will be equipped with visiting cards on which contact numbers of respective regional project manager (RPM) and project coordinator will be mentioned; workers will be educated to contact these numbers on noncompliances they observe.
5. Leaflets with information on emergency numbers will be distributed among workers.

**Deadline**

**Date:**

**Action**

**Taken:**

Plan  
Complete:

Plan  
Complete  
Date:

### Child Labor: Proof of Age Documentation

CL.3 In cases where proof of age documentation is not readily available or is unreliable, growers will take precautions to ensure all workers are at least the minimum working age, including using medical, religious or school records or other means considered reliable in the local context.

#### Noncompliance

**Explanation:** None of the farms visited maintained any age proof verification documents for young workers.

Sources: grower interviews, record review

**Plan Of Action:** Actions:  
1. Syngenta already has a wage verification process in place, but it needs to be strengthened in the next season.  
2. Syngenta has planned to establish a village level committee for some key villages involving opinion leader, panchayat and school. This committee will help in identifying the age of the labor in the group.

Deadline  
Date:

Action  
Taken:

Plan  
Complete:

Plan  
Complete  
Date:

### **Child Labor: Other Means of Age Verification**

CL.4 Growers shall abide by all the relevant rules and procedures where the law requires government permits or permission from parents as a condition of employment.

#### **Noncompliance**

**Explanation:** For age verification, school and medical records are also considered as reliable, but most farms have not maintained any of these records.

Sources: grower interviews, record review

**Plan Of** Actions:

**Action:**

1. Syngenta already has a wage verification process in place, but it needs to be strengthened in the next season.
2. Syngenta has planned to establish a village level committee for some key villages involving opinion leader, panchayat and school. This committee will help in identifying the age of the labor in the group.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**

### **Child Labor: Education of Young Workers**

CL.8 The grower will ensure that children (all children, including those residing on the farm) will not have access to areas such as those of machine/electric operation, pesticide/fertilizer application, storage, or other areas where there are activities that could cause harm to children.

#### **Noncompliance**

**Explanation:** None of the young workers interviewed are attending school/college. The nature of the work demands a minimum of 7-8 hours a day, making it difficult to attend both school and work simultaneously.

Source: worker interviews

**Plan Of Action:** Actions: Syngenta is collaborating with local schools. Team is finding difficulty, as there are no special schools to admit aged children into higher classes. Though this is not for all cases, we are working on this direction and exploring involving local stakeholders, NGOs and CSOs for such cases. Village level committee consisting of opinion leaders, school and panchayat will be established in major villages to discuss and remediate this issue.

**Deadline Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

### **Child Labor: Removal and Rehabilitation of Child Laborers**

CL.10 If a child laborer is found working on the farms, the grower and the company shall ensure that the child is immediately removed from the farm, rehabilitated and brought into the mainstream school system. The grower and company will make efforts to make this rehabilitation sustainable.

#### **Noncompliance**

**Explanation:** In the past when children were found on farms, they were removed from work. However, there was no evidence to suggest they were all rehabilitated and brought into the mainstream school system. Lack of special schools for aged children who have never been to school is one of the reasons for the non-rehabilitation of all child laborers.

Sources: grower and management interviews

**Plan Of Action:** Actions: Syngenta is collaborating with local schools. Team is finding difficulty, as there are no special schools to admit aged children into higher classes. Though this is not for all cases, we are working on this direction and exploring involving local stakeholders, NGOs and CSOs for such cases. Village level committee consisting of opinion leaders, school and panchayat will be established in major villages to discuss and remediate this issue.

**Deadline  
Date:**

**Action  
Taken:**

**Plan  
Complete:**

**Plan  
Complete  
Date:**

### **Non-Discrimination: General Compliance Non-Discrimination**

D.1 All employment decisions shall be made solely on the basis of a person's qualifications, in terms of education, training, experience, demonstrated skills and/or abilities, as they relate to the inherent requirements of a particular job.

#### **Noncompliance**

**Explanation:** Local legal procedures and regulations concerning non-discrimination of workers in wage payments and work allocation are not followed.

Sources: worker and grower interviews

Legal References: The Equal Remuneration Act 1976, The Minimum Wages Act 1948

**Plan Of** [Actions:](#)

**Action:** Training programs would be conducted to create awareness of regulations and procedures regarding wage discrimination amongst men and women.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**



## Non-Discrimination: Employment Decisions

D.2 There shall be no differences in remuneration between male and female workers for work of equal value. Remuneration (wages, compensation) includes the basic minimum or prevailing industry wage, along with any additional payments to be made directly or indirectly, whether in cash or in kind, by the grower to the worker arising out of the worker's employment. Such additional payments include wage differentials or increments based on seniority or marital status; cost of living allowances; housing or residential allowances; family allowances; benefits in-kind, such as the allotment and cleaning of work clothes or the provision of fire wood, spices, raw material for food, equipment; and other benefits.

### Noncompliance

**Explanation:** Gender discrimination in wages and work allocation is widely prevalent in all visited farms. Dividing labor along gender lines and paying male and female workers different wages are common practices in this region and observed in all crops.

Sources: worker and grower interviews

**Plan Of Action:** Actions: Both males and females will be provided equal wages for equal work. Syngenta will create awareness in production regions on this and shall monitor this under internal monitoring. In some cases, where male laborers are engaged in some additional work other than pollination, which includes hard work like plowing, spraying, digging, etc., male laborers are paid higher than female laborers.

**Deadline Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

### **Non-Discrimination: Sex-Based Wage Discrimination**

D.3 Growers shall not discriminate on the basis of marital status. Growers shall not threaten female workers with dismissal or any other employment decision negatively affecting their employment status, in order to prevent them from becoming pregnant or getting married.

#### **Noncompliance**

**Explanation:** Gender discrimination in wages and work allocation is widely prevalent in all visited farms. Dividing labor along gender lines and paying male and female workers different wages are common practices in this region and observed in all crops.

Sources: worker and grower interviews

Legal References: The Equal Remuneration Act 1976, The Minimum Wages Act 1948

**Plan Of Action:** Actions:  
Training programs would be conducted to create awareness of regulations and procedures regarding wage discrimination amongst men and women.

**Deadline Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Code Awareness:**

GEN. 2 Ensure that all company growers, as well as seed organizers, inform their workers about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by workers) and undertake other efforts to educate workers about the standards on a regular basis.

**Noncompliance**

**Explanation:** Growers have not informed workers about workplace standards.

Sources: farm visits; record review; grower, worker and management interviews

**Plan Of Action:** Syngenta has undertaken eggplant production with some new growers and will insist growers train workers on code of conduct (COC). During COC training, Syngenta will also insist growers in inviting workers.

Actions:

1. COC will be not posted at each farm, but rather, relevant messages posted or disseminated in village schools, temples, common meeting places, and offices of local administration body (panchayat), organizers and companies as prescribed by stakeholders.
2. Trainings will be customized for family labor farms. The grower, who is generally the head of the family, can be trained as an educator. Women members (mothers/elder women) of family will be involved in awareness programs. Communication strategy for each target audience within program: organizers, growers, family laborers and hired laborers will be developed.
3. Peer-to-peer awareness building model (worker-to-worker, grower-to-grower, supervisor-to- supervisor, women-to-women) and self-help groups will be established. A separate meeting will be held for women, keeping cultural sensitivities in mind.
4. Women community mobilizers are appointed, as there is a need to increase women mobilizers to work closely with growers' families and workers.

**Deadline  
Date:**

**Action  
Taken:**

**Plan  
Complete:**

**Plan  
Complete  
Date:**

**Code Awareness: Other (Company Internal Grievance Policy and Procedures)**

Other

**Noncompliance**

**Explanation:** There is some mechanism to address growers' grievances, but there is no means by which workers can report their grievances directly to the company. Company has a number mentioned on the attendance register; however, this is not properly maintained by most growers and workers do not have access to the same.

Sources: record review; worker and grower interviews

**Plan Of Action:** Syngenta to create awareness through training programs for all concerned stakeholders on noncompliance, develop a culture of transparent work environment and establish strong communication among the team.

Actions:

1. Syngenta has started engaging opinion leaders, teachers and women at the village level to form a committee to serve as a channel for information dissemination and worker grievances. At least 50% of these Grievance Committee members will be women. Company will take appropriate steps to publicize this grievance channel among growers and workers. Contact information of village committee members, organizers and company supervisors will be made available to growers and workers. Village committee will contact company in case of grievances.
2. One day per month will be assigned to the company representative to deal with worker grievances at the field level. All grievances from the workers will be documented for analysis.
3. In the long term, an internal system within the monitoring program will be developed to award growers with zero grievances.
4. Supervisors will be equipped with visiting cards on which contact numbers of respective RPM and project coordinator will be mentioned; workers will be educated to contact these numbers about noncompliances they observe.
5. Leaflets with information on emergency numbers will be distributed among workers.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**

**Health and Safety: General Compliance Health and Safety**

H&S.1 Growers shall comply with all local laws, regulations, and procedures concerning health and safety. In any cases where local laws and the Workplace Code of Conduct are contradictory, the higher standards will apply. The grower will possess all legally required permits.

**Noncompliance**

**Explanation:** Local law stipulates employers provide training, personal protective equipment (PPE), and health checkups for workers employed in handling chemical pesticides. This is not completely followed. Not all workers involved in pesticide application are provided training on the safe handling of pesticides.

Sources: worker and grower interviews

Legal Reference: The Insecticides Act 1968

**Plan Of  
Action:**

As this is a new location, 100% of growers are not covered under the PPE scheme. In consultation with an agency, we have locally designed some sort of protection which is widely used during chemical spraying. Though it is not a formal PPE set, it serves the purpose of formal PPE.

Actions:

1. Organize a greater number of these trainings to cover all growers, with the help of the Crop Protection (CP) team.
2. Engage one agency that will help the company address this issue at a greater level.
3. Explore the possibility of equipping all growers with PPE.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**

### **Health and Safety: Document Maintenance/Worker Accessibility and Awareness**

H&S.2 All documents required to be available to workers and growers by applicable laws (health and safety policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language(s) spoken by the workers if different from the local language. If the workers are illiterate, the company shall make an effort to provide pictorials that the workers can easily understand.

#### **Noncompliance**

**Explanation:** [MSDS are not available with growers.](#)

[Sources: worker and grower interviews](#)

**Plan Of**

**Action:**

[Actions:](#)

[The abstracts of Material Safety Data Sheets \(MSDS\) \(in all regional languages\) are always available with all chemicals purchased by growers. MSDS in detail are not available with all growers, but are available at location offices. However, implementing team is well trained on MSDS and we regularly pass this message to growers and workers. We are trying to explore the possibility of MSDS availability with all growers.](#)

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan  
Complete  
Date:**

### **Health and Safety: Health and Safety Management System**

H&S.4 The health and safety policy shall contain the framework for a comprehensive health and safety management system within which growers' responsibilities; workers' rights and duties; various responsibilities of designated personnel; procedures that enable workers to raise health and safety concerns; and procedures for reporting death, injury, illness, and other health and safety issues (for instance, near-miss accidents) are clearly and regularly tested and reviewed.

#### **Noncompliance**

**Explanation:** Policy does not clearly specify comprehensive health and safety management systems.

Sources: management interviews, record review

**Plan Of  
Action:** Formal, disciplined working systems H&S policy is developed. This document explains company's stance on H&S. Document is available at all Internal Monitoring (IMS) centers. However, key points of this are included in the document "Best Seed Production Practices," which is explained and given to growers at the time of seed production.

Action:  
Create more awareness on HSE aspects.

**Deadline  
Date:**

**Action  
Taken:**

**Plan  
Complete:**

**Plan  
Complete  
Date:**

### Health and Safety: Communication to Workers

H&S.5 The health and safety policy shall be communicated to all workers in the local language or language(s) spoken by workers if different from the local language.

#### Noncompliance

**Explanation:** Most workers have not received any communication in regards to the company's health and safety policy.

Source: worker interviews

**Plan Of Action:** Formal, disciplined working systems H&S policy is developed. This document explains company's stance on H&S. Document is available at all IMS centers. However, key points of this are included in the document "Best Seed Production Practices," which is explained and given to growers at the time of seed production.

Action:  
Create more awareness on HSE aspects.

**Deadline  
Date:**

**Action  
Taken:**

**Plan  
Complete:**

**Plan  
Complete  
Date:**



## Health and Safety: Access to Safety Equipment and First Aid

H&S.6 Company should ensure that growers and workers have access to safety equipment and first aid.

### Noncompliance

**Explanation:** First aid boxes are not maintained at farms.

Sources: grower and management interviews; record review

**Plan Of Action:** First aid kits are kept with schools, farmers and workers. Being new locations, some places are missed, but trainings are in progress in this area. Practically, it is difficult to supply first aid kits to all growers.

#### Actions:

1. Syngenta will provide first aid boxes to key villages and they will be kept at important junctions like schools, panchayat or with any responsible growers.
2. Additional requirements will be worked out and purchased.
3. Growers will be encouraged to keep first aid boxes on their own.
4. Growers will be sufficiently trained in the effective use of first aid.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**

## Health and Safety: Personal Protective Equipment

H&S.7 All necessary personal protective equipment (PPE) (gloves, eye protection, respiratory protection, etc.) should be made available to relevant workers to prevent unsafe exposure (inhalation or contact with solvent vapors, dust, etc.) to health and safety hazards.

### Noncompliance

**Explanation:** Company has not distributed PPE to all growers.

Sources: grower and management interviews; record review

**Plan Of Action:** As this is a new location, 100% of growers are not covered under the PPE scheme. In consultation with an agency, we have locally designed some sort of protection which is widely used during chemical spraying. Though it is not a formal PPE set, it serves the purpose of formal PPE.

#### Actions:

1. Organize a greater number of the trainings to cover all growers, with help of the CP team.
2. Engage an agency which will help the company address this issue at a greater level.
3. Explore the possibility of equipping all growers with PPE.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**

### Health and Safety: Chemical Management and Training

H&S.8 All chemicals and hazardous substances, farm produce, and raw materials should be properly labeled and stored. The grower shall not use any banned (either by national or international laws) pesticides, fertilizers, or any other agro chemicals on the farm. Grower shall ensure the safe disposal of waste chemicals; empty containers of chemicals; and packing materials. Grower/organizer/company will provide necessary training for workers in regard to handling agro chemicals (pesticides, fertilizers, and other hazardous substances), their application and PPE use.

#### Noncompliance

**Explanation:** Most growers and workers interviewed reported that they have not received any formal training on H&S from the company, except for code awareness programs conducted at [Local council] and [Local council].

Sources: grower and management interviews; record review

**Plan Of**

Actions:

**Action:**

1. Organize a greater number of trainings to cover all growers.
2. Engage an agency to help the company address this issue at a greater level.
3. Stringent monitoring.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**

### **Health and Safety: Machinery Maintenance and Worker Training**

H&S.11 All production machinery, equipment, and tools shall be regularly maintained and properly guarded. Workers shall receive training in the proper use and safe operation of machinery, equipment, and tools they use.

#### **Noncompliance**

**Explanation:** Workers have not received any training on the proper use and safe operation of machinery and equipment.

Sources: worker and grower interviews

**Plan Of Action:** There is no complicated machinery used by growers for seed production. We always cover these issues during safe chemical handling trainings.

Actions:

1. Organize more awareness campaigns on this.
2. In the monitoring tool, we have added this as a separate element.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**

**Hours of Work: General Compliance Hours of Work**

HOW.1 Growers shall comply with all local laws, regulations, and procedures concerning hours of work, public holidays, and leave.

**Noncompliance**

**Explanation:** During peak cross pollination period, sometimes the work extends beyond 10 hours.

Sources: worker and grower interviews

**Plan Of Action:** Actions: Awareness about hours of work is to be created among workers and growers; a mechanism to record hours of work is to be created.

**Deadline Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

### **Hours of Work: Rest Day**

HOW.2 Workers shall be entitled to at least 1 day off in every 7-day period. In cases where workers have to work for several days without a day off due to the requirement of the production cycle, they can do so as far as they voluntarily agree to it.

#### **Noncompliance**

**Explanation:** [Workers are not entitled for paid rest days or weekly days off.](#)

[Sources: worker and grower interviews](#)

**Plan Of Action:** [Actions:](#) Awareness about hours of work is to be created among workers and growers; a mechanism to record hours of work is to be created.

**Deadline Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Hours of Work: Overtime**

HOW.4 Growers shall provide reasonable meal and rest breaks, which, at a minimum, comply with local laws.

**Noncompliance**

**Explanation:** [During peak cross pollination period, sometimes the work extends beyond 10 hours.](#)

[Source: worker interviews](#)

**Plan Of Action:** [Actions:](#)  
[Awareness about hours of work is to be created among workers and growers; a mechanism to record hours of work is to be created.](#)

**Deadline Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Hours of Work: Public Holidays**

HOW.6 Growers shall use positive incentive schemes to induce overtime and shall ensure that workers know of such incentive schemes.

**Noncompliance**

**Explanation:** [Workers reported that they work even during public holidays.](#)

[Source: worker interviews](#)

**Plan Of** [Actions:](#)

**Action:** [The concept of no work on public holidays is to be educated among growers; a list of public holidays is to be given to them.](#)

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan**

**Complete:**

**Plan**

**Complete**

**Date:**